REMARKS

The following presentation is intended to comply with 35 U.S.C. 102(b) and 35 U.S.C. 103(a) and respond to rejection of the claimed invention as presented by the examiner.

1. The prior art references, as cited by the examiner, are impossible to be legally combined because they take mutually exclusive paths to reach different solutions to a problem and, therefore, by implication each teaches away from combining itself with the other.

2. Doubtless, if the elements within the prior art are combined, the references would fall short of amended claim **1,** within the present invention.

3. Prior art references, cited by the examiner, are vague and unclear or require translation, so these teachings lack motivation to be combined (expressed or implied) so as to produce results of the present invention.

4. Prior art references cited is deficient of any suggestion that modification will result in features claimed within amended claim **1** of the present invention.

5. Prior art references, cited by the examiner, are individually complete and functional, so reason or motivation to employ parts, add or combine these teachings is lacking.

6. The combination of references, cited by the examiner, is too complicated to be considered obvious.

7. The fact that multiple references must be combined to achieve results is evidence that the present invention is both novel and unobvious.

8. Applicants invention, within the present application as amended, solves a problem different from a combination of teachings of the prior art. This result was established by judgment within In re Wright, 6 USPQ 2d 1959 (1988).

9. Consideration of a prior art search resulted in filling the present application and provides evidence that prior art was evaluated and determined to be inapplicable.

10. Regarding prior art references, cited by the examiner, this prior art was found to be groundless within the present application.